

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

October 7, 2021  
By [Signature] Ravi Subramanian, Clerk  
Deputy

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALONSO RAMIREZ-CRUZ and

IVAN SUBIA

Defendants.

CASE NO. **CR21-160JC**  
**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

**(Possession of Controlled Substances with Intent to Distribute)**

On or about August 10, 2021, at Seatac, in King County, within the Western District of Washington, and elsewhere, the defendants, ALONSO RAMIREZ-CRUZ and IVAN SUBIA, did knowingly and intentionally possess with the intent to distribute, and did aid and abet the possession of, with intent to distribute, methamphetamine, heroin, fentanyl, and cocaine, substances controlled under Schedules I and II of Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers.

INDICTMENT

*United States v. Ramirez-Cruz et. al. - 1*

UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970

Presented to the Court is the proposed  
to amend the Court's order dated 10/07/21  
the Court's order dated 10/07/21, and  
the Court's order dated 10/07/21.

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1 The Grand Jury further alleges that this offense involved one kilogram or more of  
2 a mixture and substance containing a detectable amount of heroin.

3 The Grand Jury further alleges that this offense involved 400 grams or more of a  
4 mixture and substance containing a detectable amount of N-phenyl-N- [1- (2-  
5 phenylethyl) -4-piperidiny] propenamide.

6 The Grand Jury further alleges that this offense involved 500 grams or more of a  
7 mixture and substance containing a detectable amount of cocaine, its salts, optical and  
8 geometric isomers, and salts of its isomers.

9 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A),  
10 841(b)(1)(B), and Title 18, United States Code, Section 2.

### 11 **ASSET FORFEITURE ALLEGATION**

12 All of the allegations contained in this Indictment are hereby re-alleged and  
13 incorporated by reference for the purpose of alleging forfeiture. Upon conviction of the  
14 offense alleged in Count 1, the defendants ALONSO RAMIREZ-CRUZ and IVAN  
15 SUBIA shall each forfeit to the United States, pursuant to Title 21, United States Code,  
16 Section 853, any property that constitutes or is traceable to proceeds of the offense, as  
17 well as any property that facilitated the offense.

18 **Substitute Assets.** If any of the above-described forfeitable property, as a result of  
19 any act or omission of the defendant,

- 20 a. cannot be located upon the exercise of due diligence;
- 21 b. has been transferred or sold to, or deposited with, a third party;
- 22 c. has been placed beyond the jurisdiction of the Court;
- 23 d. has been substantially diminished in value; or,
- 24 e. has been commingled with other property which cannot be divided  
25 without difficulty;

26 //

27  
28 INDICTMENT

*United States v. Ramirez-Cruz et. al. - 2*

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1 it is the intent of the United States, pursuant to Title 21, United States Code, Section  
2 853(p), to seek the forfeiture of any other property of the defendants up to the value of  
3 the above-described forfeitable property.  
4

5 A TRUE BILL:

6 DATED: 06 October 2021

7  
8 *Signature of Foreperson redacted*  
9 *pursuant to the policy of the Judicial*  
10 *Conference of the United States*

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14 FOREPERSON

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TESSA M. GORMAN  
Acting United States Attorney

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THOMAS WOODS  
Assistant United States Attorney

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KRISTINE L. FOERSTER  
Assistant United States Attorney